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**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 8/4/2021

August 3, 2021

By ECF

Hon. Vernon S. Broderick
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

**Re: United States v. Franklin Mejia Martinez
21 Cr. 408 (VSB)**

Dear Judge Broderick,

A status conference in this matter is scheduled for Thursday, August 5, 2021 at 9:00 a.m. Since the last court date, defense counsel has continued to meet with Mr. Mejia-Martinez at jail, engage in plea discussions with the Government, and review discovery. Although some details remain unresolved, the defense is optimistic that an agreement with the government will be reached. Accordingly, the defense respectfully requests that the status conference be adjourned for 45-days to allow the parties additional time to complete their plea negotiations.

I have discussed the above with A.U.S.A. Rebecca Dell, who consents to this adjournment request. For the above reasons, as well as in the interests of justice, the defense consents to the exclusion of time under the Speedy Trial Act until the anticipated adjourn date.

Thank you.

Respectfully Submitted,

/s/ Matthew J. Kluger
Matthew J. Kluger, Esq.

cc: AUSA's Rebecca Dell